



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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Ref: 8EPR-N

Noelle Meier
Motorized Travel Plan Project Leader
Dixie National Forest
1789 N. Wedgewood Lane
Cedar City, UT 84720

Re: Dixie National Forest Motorized Travel Plan
Final EIS: CEQ #20090165

Dear Ms. Meir:

The U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the Dixie National Forest Motorized Travel Plan in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C 4231 and Section 309 of the Clean Air Act.

EPA supports the Motorized Travel Plan proposal to prohibit motorized cross-country travel in undesignated areas and to designate authorized routes and uses of routes. A reduction in natural resource impacts will occur as a result of elimination of cross country travel and a better management of the travel route system. Our review of the FEIS and ROD for this project found both documents to be generally responsive to the concerns we expressed with the Draft EIS, however we offer several additional comments regarding information needed and points of clarity.

New Road Construction

EPA's comment 59-1 on page B-100 of the FEIS states, "While the project does minimize new road construction, we have concerns about the resource impacts caused by construction of new or relocation of designated routes." In your response to the comment you state that, "no new road construction is proposed in this project." However, it appears to be contradictory to the decision made in the ROD. The selected alternative D with modifications, proposes new construction of motorized trails in an alternative location.

The ROD states on page 3, "Some of the system routes that are negatively impacting soil, water, and wildlife resources, and/or are not needed for future resource management activities will be closed." However, the impact on new road construction does not appear to be specifically addressed in the FEIS/ROD. EPA recommends that

new road resource impacts, especially due to erosion should be identified, evaluated, and documented.

There is also a reference to proposed construction of a motorized trail in an alternative location to provide access to numerous trails to the east of Brian Head, on page 3 of the ROD. The separate decision document should identify any site-specific effects with existing perennial streams, lakes, and wetlands in the watershed that may be impacted by new road construction in this area. If impacts are expected, current water quality data should be disclosed and potential impacts discussed. We do acknowledge reference to the Hydrology Specialist Report on page B-33 of the FEIS with regard to water quality. However, a *summary* of wetlands and aquatic impacts should be included in the separate decision document.

Preferred Alternative

The summary table which included a description of the Preferred Alternative D modifications was lengthy and unclear for those not completely familiar with the forest. Our initial feedback is that Alternative D now looks like an altogether new alternative. For the record please explain how the Forest Service decision making process will proceed and whether these modifications will undergo resource impact scrutiny. If alternate D with modifications has any major influence/impact on the environment, this information should also be available for public review in the decision document.

We appreciate the opportunity to participate in this analysis. If you have any questions or would like to discuss our comments, please contact me (303-312-6004) or Sarah Hester (303-312-6008) of my staff.

Sincerely,

Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection
and Remediation